

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street - 10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton  
Executive Director  
and Attorney-in-Chief*

Southern District of New York  
*Jennifer L. Brown  
Attorney-in-Charge*

April 12, 2022

**BY ECF**

Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Andrew Joyner,  
20 Cr. 505 (DLC)**

Dear Judge Cote:

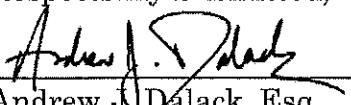
I write on behalf of the parties regarding the sentencing proceeding in the above-captioned case, which was recently reassigned to Your Honor from Judge Alison J. Nathan.

Sentencing is currently scheduled for April 26, 2022, at 3:00 p.m. The parties understand that the Court's individual rules for sentencing require the defense to file its submission two weeks before sentencing and the Government to file its submission one week before sentencing. The parties seek the Court's leave to deviate from this schedule. Specifically, the parties jointly and respectfully request that the Court accept the defense submission one week before sentencing (by April 19, 2022) and the Government's submission three days before sentencing (by April 22, 2022).

In the alternative, the defense respectfully requests that the Court adjourn sentencing to the week of May 2, 2022, (but not to 10:30 a.m. on Wednesday, May 4 or to 12:00 p.m. on Thursday, May 5), or to the week of May 16, 2022, (but not to 3:00 p.m. on Thursday, May 19). The Government consents to this application.

*Defense submissions are due  
4/19; The Government's are  
due 4/22. From the 4/19/22  
Cc: AUSA Andrew Rohrbach*

Respectfully Submitted,

  
Andrew J. Dalack, Esq.  
Assistant Federal Defender